

KML LAW GROUP, P.C.
A PROFESSIONAL CORPORATION INCORPORATED IN PENNSYLVANIA

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March 31, 2023

The Honorable Michael B. Kaplan, U.S.B.J.
Courtroom # 8
402 E. State Street
Trenton, NJ 08608

RE: Patrick Mazza
Case No. 20-11209-MBK
Premises: 58 Maremanna Dr., Manalapan, NJ 07726
Secured Creditor: Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.

Dear Judge Kaplan,

This office represents Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. (“Secured Creditor”), holder of a mortgage on real property located at 58 Maremanna Dr., Manalapan, NJ 07726. Please accept this letter in response to Debtor’s motion to sell the subject property.

Secured Creditor has reviewed the current motion to sell and the proposed form of order filed with the Court. Secured Creditor does not object to the motion or the proposed order in its current form. However, should the proposed order be revised, or if the underlying facts supporting the motion should change, including but not limited to the purchase price, Secured Creditor reserves its right to object to the motion.

The Debtor is required to request a formal payoff prior to closing to ensure the loan is paid in full in accordance with the terms of the note, mortgage and applicable state laws. Secured Creditor’s response, in its present form, is not an objection to the current motion to sell the subject property. The undersigned does not intend to appear to prosecute an objection at this

time unless the proposed order is amended to a form deemed objectionable.

Respectfully,
KML LAW GROUP, P.C.

/s/ Denise Carlon
Denise Carlon, Esquire
dcarlon@kmlawgroup.com
Attorney for Secured Creditor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

KML Law Group, P.C.
By: Denise Carlon Esquire
701 Market Street, Suite 5000
Philadelphia, PA 19106
215-627-1322
Attorneys for Secured Creditor: Rocket Mortgage,
LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.

Case No.: 20-11209-MBK

Chapter: 13

In Re:

Patrick Mazza

Debtor/Respondent

Judge:

CERTIFICATION OF SERVICE

1. I, Denise Carlon Esquire:

☒ Represent the Secured Creditor in the above-captioned matter.

☐ am the secretary/paralegal for , who represents the Secured Creditor in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On March 31, 2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

- Response to Motion to Sell

3. I certify under penalty of perjury that the above document were sent using the mode of service indicated.

Dated: March 31, 2023

/s/ Denise Carlon
Denise Carlon, Esquire

Name and Address of Party Served	Relation of Party to the Case	Mode of Service
Patrick Mazza 58 Maremanna Drive Manalapan, NJ 07726	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
	Co-Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Steven J. Abelson Abelson Law Office 80 West Main Street PO Box 7005 Freehold, NJ 07728	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Albert Russo Standing Chapter 13 Trustee CN4853 Trenton, NJ 08650-4853	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)